

HOFLAND & TOMSHECK
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA

Case No.: 2:18-cr-00206-JAD-DJA

Plaintiff,

VS.

KEYNAN ROSE,

**Stipulation and Order to Continue
Sentencing
(Second Request)**

Defendant.

IT IS HEREBY STIPULATED AND AGREED by and between Jason M. Frierson, United States Attorney, and Christopher Burton, Assistant United States Attorney, counsel for the United States of America, and Joshua Tomsheck, Esq., counsel for Defendant, KEYNAN ROSE, that the Sentencing currently scheduled for June 13, 2022 at 3:00 P.M. be vacated and continued to a date and time to be set by this Honorable Court, but no sooner than thirty (30) days.

This Stipulation is entered into for the following reasons:

1. This is the second Sentencing continuance request.
 2. The additional time requested herein is not sought for purposes of delay, but to address important issues concerning Mr. Rose before his sentencing.
 3. Defendant is in custody and does not object to the continuance.
 4. The parties agree to the continuance.
 5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. For the above stated reasons, the parties agree that a continuance of the Sentencing date would best serve the ends of justice in this case.

DATED this 9th day of June, 2022.

Respectfully submitted,

HOFLAND & TOMSHECK

JASON M. FRIERSON
United States Attorney

/s/ Joshua Tomsheck

JOSHUA TOMSHECK, ESQ.
Counsel for Defendant
KEYNAN ROSE

/s/ Christopher Burton

CHRISTOPHER BURTON, ESQ.
Assistant United States Attorney

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KEYNAN ROSE.

Defendant.

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FINDINGS OF FACT

Based upon the pending Stipulation of counsel, and good cause appearing therefor, the Court hereby finds that:

This Stipulation is entered into for the following reasons:

1. This is the second Sentencing continuance request.
 2. The additional time requested herein is not sought for purposes of delay, but to address important issues concerning Mr. Rose before his sentencing.
 3. Defendant is in custody and does not object to the continuance.
 4. The parties agree to the continuance.
 5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
 6. For the above-stated reasons, the parties agree that a continuance of the Sentencing Date would best serve the ends of justice in this case.

Date would best serve the ends of justice in this case.

111

ORDER

IT IS HEREBY ORDERED that the Sentencing date in the above-captioned matter currently scheduled for June 13, 2022 at 3:00 P.M. be vacated and continued to July 18, 2022, at 3:00 p.m.

DATED this 10th day of June, 2022.

UNITED STATES DISTRICT JUDGE

Respectfully Submitted By:

HOFLAND & TOMSHECK

/s/ Joshua Tomsheck

JOSHUA TOMSHECK, ESQ.

Counsel for Defendant

KEYNAN ROSE